

The Planning Inspectorate
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Our ref: AC/2021/130634/01-L01
Your ref: TR010044
Date: 4 November 2021

Dear Sir/Madam

A428 BLACK CAT TO CAXTON GIBBET ROAD IMPROVEMENT SCHEME - THE EXAMINING AUTHORITY'S WRITTEN QUESTIONS AND REQUESTS FOR INFORMATION (WQ2)

Thank you for your correspondence regarding the above mentioned scheme. Our answer to your questions are provided below.

We would also like to take this opportunity to inform and remind the Examining Authority, that we are becoming increasingly concerned that Appendix 13.4 Flood Risk Assessment (APP-220) is not acceptable to us. Our position is clearly set out in our Relevant Representation and Statement of Common Ground. We are still waiting for the submission of a FRA Technical Note to address our concerns. The Examination is now well underway and we consider this fundamental information should have been submitted by now.

Aquatic Environment and Biodiversity Q2.3.6.1 Mitigation

We consider that measures could be addressed within iterations of the Environmental Management Plan (EMP), as noted by the applicant in their responses (RR-036).

Articles

Q2.7.3.13 – Article 58 – Works in the River Great Ouse

We have no further comments to add to our previous response (REP1-076) as we are still in discussion with the Applicant with regard to the wording of Article 58.

Interactions between different sources of flooding

Q2.9.2.1 Grade separated junctions

As noted by the Applicant, Chapter 13 of the Environmental Statement (ES) includes assessments of the interactions between groundwater and surface water at the three grade separated junctions and the various underpasses, cuttings and borrow pits.

Based upon the information and analyses provided, the impacts on groundwater-surface water interactions at these locations during the construction and operational phases are likely to be minor in most cases. However, in the case of the A1 Black Cat junction, the Applicant has outlined proposals to permanently seal the A1 underpass in order to prevent significant groundwater ingresses, the minor residual groundwater inflows (around 5m³/day) being collected within the road drainage network - as per *AECOM Technical Note: A428 Black Cat to Caxton Gibbet Improvements: Groundwater Risk Assessment. [60541541 October 2021] v1*. Further assessment by the applicant of the potential flood risk implications of these proposals is required. The model results that they have provided indicate that there will be an increase in flows within South Brook during the operational phase, and evidence needs to be provided to demonstrate that this will not result in any increase in flood levels within third party land. The hydraulic modelling should be revisited and a sensitivity test should be undertaken based upon a worst case scenario increase in flows to demonstrate that there will be no increase in flood risk as a result of the proposal to seal the A1 Black Cat underpass. The results of this sensitivity test should be included within the FRA Technical Note that we are still awaiting to review to address our other flood risk concerns.

Q2.9.2.2 Groundwater Dewatering

We previously understood that significant permanent groundwater dewatering might be required for the scheme, notably at the proposed A1 Black Cat Underpass. We indicated to the Applicant that this would not be acceptable. Subsequently, the Applicant has outlined proposals to permanently seal the A1 underpass in order to prevent significant groundwater ingresses during the operational phase, thereby mitigating the need for significant, permanent groundwater dewatering in this location - as per *AECOM Technical Note: A428 Black Cat to Caxton Gibbet Improvements: Groundwater Risk Assessment. [60541541 October 2021] v1*. Potential operational phase groundwater ingresses into other scheme elements are likely to be low and [according to TR010044/APP/6.1] can be mitigated by the use of groundwater flow path barriers. Further assessment by the applicant of the potential flood risk implications of permanently sealing the A1 underpass is required, as outlined within our response to Q2.9.2.1. Assuming that these proposals are implemented, however, then significant permanent groundwater dewatering is unlikely to be required for the scheme.

Brook Cottages

Q2.12.2.4 Black Cat Junction Options

e) We are aware that four design options for the River Great Ouse crossing were considered in the scoping phase. We were consulted on a Technical Note for the River Great Ouse in 2019, which set out the flood risk implications of each of these four options and included the results of modelling that had been undertaken for each of the options. The preferred option was considered have the least adverse impact on flood risk. However, with the exception of the preferred option, we were not provided with any hydraulic models or details of compensatory floodplain storage for review.

We consider that a flood risk sequential approach was taken in the selection of the preferred option for the River Great Ouse crossing as the model results for the other options showed greater increases in flood levels. However, we are unable to confirm that the Applicant had appropriate regard to flood risk, including flood compensatory

storage, in all of their option development and selection work as we did not review the hydraulic models for the other options.

Should you wish to discuss this matter further please do not hesitate to contact me.

Yours faithfully

Neville Benn

Sustainable Places

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